

Law Office of
Mark McClure, P.S.

STATEMENT

EIN: 20 3001546

22-Nov-19

625 5th Avenue South, WA 98032 | (253) 631-6484

Ronald Gregory Peralta
11424 44th Ave E.
Tacoma, WA 98446

<u>Name of Case</u>	<u>Attorney</u>	<u>Case Date</u>
In re: Ronald G. Peralta (13)	Mark C. McClure	14-Aug-18

Tuesday, November 13, 2018 through Friday, November 22, 2019

<u>Date</u>	<u>Atty</u>	<u>Description</u>	<u>Date Total</u>
13-Nov-18	ILH	Services File COS Proof of service re motion to avoid liens and enter cost slip: THIS JOB WAS PROCESSED BY: Miranda Cobb Total Postage: \$32.43 Total Printing: \$41.40 Total Invoice: \$ 73.83	\$0.00
13-Nov-18	ILH	Services review, FILE, keydate, serve (via COS Tracking Number: 6132243330) fee app 1	\$0.00
13-Nov-18	ILH	Services Review, assemble exhibits; FILE, keydate obj to claims #3 and #4. Create notice packets for service via reg and cert mail (including 11 exhibits). Draft and file proof of service for each objection	\$100.00
13-Nov-18	ILH	Services Create pdfs for service of motion to avoid liens - FILE, Keydate, Serve (via COS), Create packets for supplemental service	\$60.00
13-Nov-18	mcm	Services Review, revise, update Fee Application - approve for submission.	\$120.00
13-Nov-18	ILH	Disbursement COS Cost for motion to avoid liens	\$73.83
14-Nov-18	ILH	Disbursement Cert mail costs - obj to claims/lien avoidance	\$50.76

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15-Nov-18	ILH	Services FILE POS re Fee app 1 - Enter COS cost slip: TRACKING NUMBER:6132243330	0.1 hrs.	\$0/hr.	\$0.00
THIS JOB WAS PROCESSED BY: Brittney Simon					
Total Postage: \$32.43					
Total Printing: \$62.10					
Total Invoice: \$ 94.53					
15-Nov-18	ILH	Disbursement COS Cost for fee app 1			\$94.53
19-Nov-18	ILH	Services Review POCs - WF secured by Eurovan (non-910) and PRA (unsecured) to ensure that claims addressed in plan (they are). Save to server	0.3 hrs.	\$200/hr.	\$60.00
23-Nov-18	ILH	Services email correspondence with W to establish post filing monthly income in order to file amended I and J per plan	0.3 hrs.	\$200/hr.	\$60.00
26-Nov-18	ILH	Services letter from Wasco County Court in OR requesting details as to ticket listed in petition. Review petition - draft response indicating that listed ticket is that of non-filing spouse.	0.3 hrs.	\$0/hr.	\$0.00
26-Nov-18	ILH	Services Email reminder re DE Cert	0.2 hrs.	\$200/hr.	\$40.00
13-Dec-18	mcm	Services Review and Reply to Trustee's Response re Attorney Fee Application. - NO CHARGE	2.2 hrs.	\$0/hr.	\$0.00
13-Dec-18	ILH	Administrative - No Charge Review docket re obj to claims 3&4 and lien avoidance - File declarations and Orders. Review MCM reply to T's fee app obj and FILE. Email copy of fee app obj and reply to client.	0.3 hrs.	\$0/hr.	\$0.00
13-Dec-18	ILH	Administrative - No Charge Draft and File POS re Reply to T's obj to Fee Application	0.2 hrs.	\$0/hr.	\$0.00
14-Dec-18	ILH	Administrative - No Charge scan USPS tracking summaries re Lien avoidance and Obj to claims: Financial Assistance - 70112000000113975492; Longshoremen - 70112000000113975515; Numerica - 70112000000113975522	0.2 hrs.	\$0/hr.	\$0.00
17-Dec-18	ILH	Administrative - No Charge upload cert mail proof of receipts as supplemental to related proof of services per MCM	0.2 hrs.	\$0/hr.	\$0.00
19-Dec-18	ILH	Administrative - No Charge Revise and file unsigned Order re fee app per MCM outcome at hearing	0.2 hrs.	\$0/hr.	\$0.00
19-Dec-18	mcm	Travel Travel to Court re Hearing on Fee Application. - NO CHARGE	1 hrs.	\$0/hr.	\$0.00

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19-Dec-18	mcm	Travel Travel from Court to Office re Fee Application Hearing - NO CHARGE.	0.5 hrs.	\$0/hr.	\$0.00
19-Dec-18	ILH	Services draft 2 declarations re delivery status of motion to avoid lien and obj to claim 4 as regards Financial Assistance, Inc. Obatin USPS tracking reports and Sec of St reg agent info for exhibits to declarations. FILE linking back to POS at ECF 48 and 50	0.6 hrs.	\$200/hr.	\$120.00
19-Dec-18	mcm	Write-Down Fee Reduction per Hearing on Fee Application.			(\$1,350.00)
27-Dec-18	mcm	Services Review lodged orders directing appearance on 1/9 (0.1); review rule 7002 and 7004 (0.1); review orders and supporting docs re service (0.2); sketch out positions and arguments (0.1)	0.5 hrs.	\$400/hr.	\$200.00
28-Dec-18	mcm	E-mail Request updated pay data from client and his wife to do a budget review per agreement with Trustee.	0.1 hrs.	\$400/hr.	\$40.00
09-Jan-19	mcm	Hearing Telephonic Hearing - re objections to claims and motion to avoid j. lien. Agreed to modify orders on objection to claims; Agreed to refile motion to avoid as to FA only, modify order re other creditors.	0.5 hrs.	\$400/hr.	\$200.00
10-Jan-19	ILH	Administrative - No Charge File (re-file) Order on motion to avoid liens per MCM (after letter to judge filed and clarified service to Financial Assistance Inc.)	0.2 hrs.	\$0/hr.	\$0.00
10-Jan-19	ILH	Administrative - No Charge File Revised orders (per 1-9-19 hearing) on Obj to claims 3 and 4	0.2 hrs.	\$0/hr.	\$0.00
10-Jan-19	mcm	Correspondence Letter to Judge re Sufficiency of service - NO CHARGE.	1 hrs.	\$400/hr.	\$400.00
15-Jan-19	gem	Administrative - No Charge Drafted a cover letter for and mailed the client the 1.3.19 letter from Flagstar Bank for his actions and records.	0.1 hrs.	\$0/hr.	\$0.00
15-Jan-19	gem	Disbursement Printing cost: \$0.25/page for 1 page = \$0.25 Scanning cost: \$0.25/page for 7 pages = \$1.75 Postage cost: \$0.50/stamp for 2 stamps = \$1.00			\$3.00
16-Jan-19	ILH	Services create spreadsheet of 15 weeks of weekly paydata for budget review per Trustee/MCM - update software in prep of budget meeting	0.4 hrs.	\$200/hr.	\$80.00

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18-Jan-19	mcm	E-mail	0.2 hrs.	\$400/hr.	\$80.00
Emailed client status of motions to avoid, claim objections with copies of approved orders (0.1); also emailed client status as to payments to Trustee noting small deficiency with warning about need to cure (0.1).					
29-Jan-19	ILH	Services	0.5 hrs.	\$200/hr.	\$100.00
		create spreadsheet of W income - Update BK software with current I figure and email results to MCM for review			
31-Jan-19	ILH	Services	0.1 hrs.	\$200/hr.	\$20.00
		VM with Ron requesting that he call in to sched appt			
11-Feb-19	mcm	E-mail	0.1 hrs.	\$400/hr.	\$40.00
		Request for client to update income information and schedule a budget review.			
21-Feb-19	mcm	Services	0.2 hrs.	\$200/hr.	\$40.00
		Case review and F/U email re budget appt			
21-Feb-19	mcm	E-mail	0.1 hrs.	\$400/hr.	\$40.00
		2nd request for client to update income information and schedule a budget review.			
22-Feb-19	mcm	E-mail	0.1 hrs.	\$400/hr.	\$40.00
		3rd request for client to update income information and schedule a budget review.			
25-Feb-19	mcm	Services	0.1 hrs.	\$400/hr.	\$40.00
		Texted Client requesting that he check his emails.			
25-Feb-19	mcm	E-mail	0.1 hrs.	\$400/hr.	\$40.00
		4th request for client to update income information and schedule a budget review.			
25-Feb-19	mcm	Telephone Conference	0.1 hrs.	\$400/hr.	\$40.00
		Telecon from client's wife confirming that they will come in for the requested budget review and scheduling a time.			
25-Feb-19	mcm	Telephone Conference	0.1 hrs.	\$400/hr.	\$40.00
		Left vm for client to call re budget review.			
28-Feb-19	mcm	Services	0.4 hrs.	\$400/hr.	\$160.00
		Review file in preparation for meeting with client tomorrow, review income data, expense information, confirmed plan.			
28-Feb-19	ILH	Services	0.2 hrs.	\$200/hr.	\$40.00
		email request for 1-18-19 to present paydata for H&W in prep of 3-1-19 budget review appt.			
02-Mar-19	mcm	Services	0.2 hrs.	\$400/hr.	\$80.00
		Check emails; send 5th request - second reschedule re Budget Review - request updated family income information prior to meeting via email; texted client requesting he check his emails and offer weekend appointment.			
06-Mar-19	ILH	Services	0.3 hrs.	\$200/hr.	\$60.00
		update spreadsheet with January 18 to present weekly paystubs for H&W for MCM review - scan copies of checks			

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14-Mar-19	mcm	E-mail Clarified claim related to Puget Sound CU and Financial Assistance re Solar Panels for Trustee's Office. See ECF Nos 85 and 86.	0.2 hrs.	\$400/hr.	\$80.00
15-Mar-19	mcm	Services Prepare for budget review and plan modification by reviewing income and status of current payments on plan.	0.5 hrs.	\$400/hr.	\$200.00
15-Mar-19	mcm	Meeting Meeting with debtor and his wife to review budget and explore anticipated expenses short term and modest term; explain anticipated difficulties in approval and explore proposing 100% plan feasibility; amend budget, amend plan, draft motion and supporting declaration; review documents with client and obtain signatures.	1.8 hrs.	\$400/hr.	\$720.00
18-Mar-19	ILH	Services Edit pdfs as to hearing/court/judge - FILE motion to modify; declaration in support; modified plan; I and J; Dec 106, serve via COS (Tracking Number: 6132263177) keydate motion.	0.3 hrs.	\$200/hr.	\$60.00
19-Mar-19	mcm	Telephone Conference Telecon with AllianceOne Receivables re garnishment of community assets in violation of automatic stay. Supervisor or attorney for Allianceone is to return call.	0.2 hrs.	\$400/hr.	\$80.00
19-Mar-19	ILH	Administrative - No Charge FILE POS re motion to modify - Enter COS cost slip: TRACKING NUMBER:6132263177	0.1 hrs.	\$0/hr.	\$0.00
<p>THIS JOB WAS PROCESSED BY: Kathryn Jump Total Postage: \$38.00 Total Printing: \$102.60 Total Invoice: \$ 140.60</p>					
19-Mar-19	mcm	Telephone Conference Telecon with KC Hawthorne (counsel for Allianceone); agreed to stop garnishments for pendency of bankruptcy - will be sending partial release and accounting to our office for review.	0.1 hrs.	\$400/hr.	\$40.00
19-Mar-19	ILH	Disbursement COS Cost - motion to amend 1			\$140.60
31-Mar-19	mcm	Services Draft further Amended Plan, Motion to Amend, and Supporting Declaration and email to client for signatures and approval.	0.9 hrs.	\$400/hr.	\$360.00
01-Apr-19	ILH	Services follow up an MCM emails to get signatures back on amended plan / declaration. Left phone message with Ron.	0.2 hrs.	\$200/hr.	\$40.00
01-Apr-19	ILH	Services Scan/save signed copy of Dec/amended 3/31/19 plan; File amended motion to modify; plan; decl; Order. Serve via COS (Tracking Number: 6132265615) update keydates in casekeeper;	0.3 hrs.	\$200/hr.	\$60.00

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02-Apr-19	ILH	Administrative - No Charge FILE POS re amended motion to modify - enter COS cost slip: TRACKING NUMBER:6132265615	0.1 hrs.	\$0/hr.	\$0.00
THIS JOB WAS PROCESSED BY: Jesse Rojas					
Total Postage: \$38.00					
Total Printing: \$68.40					
Total Invoice: \$ 106.40					
02-Apr-19	ILH	Disbursement COS Cost - amended motion to modify			\$106.40
15-Apr-19	mcm	Telephone Conference Telecon with nfs confirming that the amended proposed plan contemplates retention of income tax refunds.	0.2 hrs.	\$400/hr.	\$80.00
15-Apr-19	ILH	Administrative - No Charge Draft email requesting 2018 1040 and review and signature of DSO (2nd request)	0.2 hrs.	\$0/hr.	\$0.00
17-Apr-19	ILH	Administrative - No Charge rec and process 2018 1040 and DSO (.1) - redact and upload 2018 1040 (.1) and summary email re refund to MCM (.1) - FILE DSO (.1)	0.1 hrs.	\$0/hr.	\$0.00
22-Apr-19	ILH	Administrative - No Charge check docket re amended motion to modify (ECF 99). File declaration of no objection and Order - update casekeeper	0.2 hrs.	\$0/hr.	\$0.00
07-May-19	mcm	Services Review new pay directive; review status of case via 13network; advise client of status and need to make timely payments to the Trustee.	0.3 hrs.	\$400/hr.	\$120.00
07-Jun-19	gem	Receipt Payment from the Trustee.			(\$6,363.00)
26-Jul-19	mcm	Telephone Conference Telecon with Debtor's wife: debtor's surgery keeps getting rescheduled by doctor; disability checks should roll in to help cure short term; may need to further modify plan.	0.1 hrs.	\$400/hr.	\$40.00
26-Jul-19	mcm	E-mail Email to Danielle at ch 13 T office re status.	0.1 hrs.	\$400/hr.	\$40.00
25-Sep-19	ILH	Administrative - No Charge Keydate and calendar T's motion to dismiss and response deadline	0.2 hrs.	\$0/hr.	\$0.00
02-Oct-19	mcm	E-mail follow up email regarding Trustee motion to dismiss - payment status.	0.1 hrs.	\$400/hr.	\$40.00
16-Oct-19	ILH	Services Begin draft of Response to T's motion to dismiss referencing proof of payments emailed by D's wife. Email Client (and wife) requesting additional info for declaration in support per mcm.	0.3 hrs.	\$200/hr.	\$60.00

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16-Oct-19	ILH	Services Obtain copy of initial notice of ch13 case filing. Email with copy of confirmed plan to Walla Walla district court per MCM's call with collection company (District Court Walla Walla Case No x1782638)	0.3 hrs.	\$200/hr.	\$60.00
17-Oct-19	ILH	Services Email from client's wife with info for supporting declaration to response to T's motion to dismiss. Draft declaration based on email info - Email to client for review and signature.	0.3 hrs.	\$200/hr.	\$60.00
18-Oct-19	ILH	Administrative - No Charge Receive signed declaration via email - FILE declaration in support of response per MCM	0.2 hrs.	\$0/hr.	\$0.00
01-Nov-19	AJP	Receipt Payment from Trustee - Thank you			(\$3,781.43)
06-Nov-19	AJP	Services Review case and draft fee application	0.6 hrs.	\$200/hr.	\$120.00
06-Nov-19	mcm	Draft/Revise Review and revise fee application	0.1 hrs.	\$400/hr.	\$40.00
06-Nov-19	AJP	Disbursement Estimated cost of disbursement for			\$105.00

This Statement: (\$6,280.31)

- Account Summary

Previous Balance:	\$16,984.95
+ Attorney and Paralegal Fees:	\$4,640.00
+ Costs:	\$574.12
- Payments:	(\$10,144.43)
-/+ Charges or Adjustments	(\$1,350.00)

= New Balance Due: \$10,350.81

Thank you for giving us the opportunity to be of service to you.

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